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May 24, 2018

**VIA EMAIL &
UPS EXPRESS**

Mr. Carl Brickner
Civil Investigator
US Environmental Protection Agency, Region IX
75 Hawthorne Street, SFD 7-5
San Francisco, CA 94105

Re: Information Request Letter for Pollock Operable Unit dated February 1, 2018
Los Angeles, CA

Dear Mr. Brickner:

On behalf of Conopco, Inc. d/b/a Unilever (“Conopco”), this letter provides its response to the above-referenced Information Request Letter (“the Letter”) concerning real property located at 528 N. San Fernando Road, Los Angeles, CA (“the Facility”). Thank you for providing Conopco an extension to respond to the Request by June 1, 2018.

PRELIMINARY STATEMENT/OBJECTIONS

Conopco’s response to the Letter includes both written responses to the requests in the Letter, as well as supplemental documentation. However, as an initial matter, Conopco and its affiliates wish to state their objections to the EPA’s Letter to the extent that it seeks information that is beyond the scope of the EPA’s authority under the federal Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601 *et seq.* (“CERCLA”). Courts have held that an information request is beyond the scope of CERCLA authorization if: (1) the investigation is beyond the agency’s authority under CERCLA; (2) the request is too indefinite; or (3) the request is not relevant to the legislative purposes identified in section 104(e) of CERCLA. *U.S. v. Martin*, 2000 WL 1029188, *6 (N.D. Ill. 2000); *U.S. v. Pretty Products, Inc.*, 780 F. Supp. 1488, 1506 (S.D. Ohio 1991). Consistent with these principles, an agency’s proper Request under CERCLA section 104(e) is limited to seeking information about (a) the identification, nature, and

quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility, (b) the nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility, or (c) information relating to the ability of a person to pay for or to perform a cleanup. Since the EPA submitted its Letter pursuant to its authority under CERCLA, the foregoing limitations are applicable to the Letter and Conopco is providing its responses accordingly.

Nevertheless, Conopco is willing to work with USEPA to provide it with information to the extent that it is relevant and reasonably obtained, subject to the following objections (the "General Objections"):

A. Conopco asserts all applicable privileges and protections it has with regard to USEPA's enumerated requests, including the attorney-client privilege, the attorney work product doctrine, the privilege for materials generated in anticipation of litigation, and privileges for materials which are proprietary, company confidential, or trade secret. CERCLA does not require a party to divulge such information in response to information requests;

B. Conopco objects to any requirement to produce documents or information already in the possession of a government agency, or already in the public domain. Such requirement is duplicative and, therefore, unduly burdensome;

C. Conopco objects to the requests on the grounds that the requests use undefined terms and are overbroad, vague, ambiguous, irrelevant and unduly burdensome so as to exceed statutory authority under CERCLA and contravene Conopco's constitutional rights. In responding to these requests, Conopco relies on the definition of these terms as they are commonly used (*i.e.*, their dictionary definitions);

D. Conopco objects to the requests on the grounds that the requests are overbroad and unduly burdensome in that they seek information or documents regarding facilities either prior to or after Conopco's ownership or occupancy of the Facility. As such, each of these requests exceeds USEPA's statutory authority under CERCLA and contravenes Conopco's rights;

E. Conopco hereby disavows any obligation to supplement these responses on an ongoing basis. CERCLA Section 104(e)(2) authorizes USEPA to require submission of information upon reasonable notice. Conopco conducted a review of available records that was practicable given the time period Conopco had to respond to this request and has supplied all information concerning the Facility, which was found during that review. If more information is desired, Conopco respectfully requests further reasonable notice that such information is desired;

F. Conopco objects to the requests to the extent they call for Conopco to make a legal conclusion concerning Conopco's potential liability under CERCLA for the Site; and

G. Conopco objects to the requests to the extent they seek trade secrets or other confidential business information.

Notwithstanding and without waiving these objections, and subject to them, Conopco has prepared this response based upon the information available to it. Where requests are vague, ambiguous, overbroad, unduly burdensome, or beyond the scope of USEPA's authority pursuant to Section 104(e) of CERCLA, Conopco is making appropriate and reasonable efforts to provide responsive information based on Conopco's interpretation of the requests. To the extent that information submitted herein is not required by law or is otherwise outside the scope of USEPA's 104(e) authority, that information is voluntarily submitted. Conopco waives no rights or protection of information it voluntarily submits.

PRELIMINARY STATEMENT REGARDING THE FACILITY

As background, Unilever acquired Thomas J. Lipton, Inc. in 1936. Thomas J. Lipton, Inc. ("Lipton") merged with Lawry's Foods, Inc. (Lawry's") in 1979 with Lipton being the surviving entity. At that time, the Facility served as the parking lot for the Lawry's business headquarters known as the Lawry's California Center (the "California Center"). Lipton was merged into the Conopco operating company in 1988 and Lawry's California Center's real property was subsequently transferred to Conopco.

At the outset, Conopco expresses its disappointment that EPA and the Regional Water Quality Control Board for the Los Angeles Region ("RWQCB") did not review the administrative record submitted by Conopco to the RWQCB in undertaking a significant and costly remediation of the Facility property from 1991-2003. The contamination identified and remediated had a clear nexus to the prior owner of the Facility, the Chromal Plating Company ("Chromal") that was addressed in a cost recovery litigation.

The record indicates that Chromal owned and operated a commercial plating business at the Facility located at 528 N. San Fernando Road from approximately 1940 to 1959. The northern portion of the Facility site was transferred to the State of California (Caltrans) in 1959. Lawry's and later Conopco obtained the southern portion of the site in 1981. It is understood that Lawry's/Conopco leased the northern portion of the Facility from Caltrans. The Facility property was used by Lawry's as a parking lot for its California Center. There were no buildings or structures on the Facility site.

The Lawry's California Center was a showcase for Lawry's business and its brands. The California Center included restaurants, a wine shop, gift shops, exercise areas, facilities maintenance, and a limited amount of food manufacturing and warehousing areas. The California Center closure happened in phases from 1989 to 1991. In preparation for sale of the California Center, Conopco undertook environmental reviews of the real property. Since the Facility site was exclusively used as a parking lot, and since the largest portion of it was owned by Caltrans, the review and ultimate remediation of the Facility was managed separately as the "Former Chromal Plating Site, Former Lawry's California Center" remediation under Case File No. 95-094 for the RWQCB (hereinafter, "Chromal Plating Site"). Caltrans and Conopco jointly pursued cost recovery for this remediation in federal court from Chromal and its successors in interest. The case was settled in late 1996 and the settlement was finalized in 1997. Settlement documents explain how funds from the parties and their insurers were used to form the "Qualified Settlement Fund" to finance the remediation. See Exhibits GG through NN.

QUESTIONS

Without waiving all applicable privileges, protections and/or objections, Conopco wishes to cooperate fully with the EPA in this matter and therefore is submitting the following information in response to the Request. These responses should not be construed as an admission of any fact or liability by Conopco and, in fact, Conopco expressly reserves its right to assert any and all defenses which are or may become available with respect to the Site. In the spirit of cooperation we have attempted to provide responsive information to the extent possible.

As noted above, Conopco operated a parking lot at the Facility property subject to this information request. Accordingly, none of the questions in Enclosure C are applicable to its operations. Below, Conopco provides its responses to the questions included in Enclosure B.

1. State the full legal name, address, telephone number, position(s) held by, and tenure of the individual(s) answering any of the questions, below on behalf of Conopco, Inc. (the "Company").

Kathleen Donnelly (Kate)
Senior Counsel – Environmental & Safety
Unilever Law Department
700 Sylvan Avenue
Englewood Cliffs, NJ 07632

Kate has provided environmental counsel to Conopco since 1999.

2. Identify all individuals who are responsible for environmental matters at the property owned by the Company that once comprised the historical address 528 N. San Fernando Road (the "Facility"). A copy of a map depicting the approximate location of the former 528 N. San Fernando Road Facility is provided as Exhibit 1. Henceforth, the term "Facility" shall be interpreted to include both the real property identified in this paragraph and any improvement thereto. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates each individual held such position.

Conopco has not operated at the Facility property since 1999, and there are no individuals associated with Conopco with current responsibilities for environmental matters at the Facility. Even when Lawry's operated the Facility, the property served as a parking lot for the California Center and there was no individual responsible for environmental matters for that lot. The subsequent remediation of the Chromal Site was managed by an entity known as the Qualified Settlement Fund, which was created by a Joint Remediation Agreement between Caltrans and Conopco. See Exhibit NN. Mr. Bruce Edelson, an independent environmental consultant, managed the remediation work on behalf of the Qualified Settlement Fund. See Exhibit MM. His last known address (which appears to be active based on Google searches) was 28520 Meadowmist Drive, Rancho Palos Verdes, CA 90275. Ruth Adelman, Lipton/Unilever's Environmental Affairs Manager, retired in 2006. Her last known address is PRVY-Controlled/Privacy

PRVY-Controlled/Privacy. For your reference, the remediation documents are included as Exhibits K through FF.

3. Explain the Company's present operational status (e.g., active, suspended, defunct, merged or dissolved).

Conopco, Inc. is an active operating company, which sold the Facility in 1998. See Exhibit D.

4. Provide the date the Company was incorporated, formed or organized. Identify the State in which the Company was incorporated, formed or organized

The information sought in Request No. 4 can be found in public records, SEC filings and New York Secretary of State records, which are already available to USEPA. Conopco, Inc., a New York corporation (FEIN 13-1840427), is a wholly owned subsidiary of Unilever United States, Inc. Conopco is Unilever's primary operating company in the U.S. Its principal place of business is 700 Sylvan Avenue, Englewood Cliffs, New Jersey.

5. Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture or corporation), under which the Company currently exists or operates

Conopco operates as a corporation.

6. Identify all former business structures under which the Company currently existed or operated and for each, identify:

- a) corresponding dates that it existed or operated under the business structure; and**
- b) the name(s) it used**

Given the age and size of the company, Conopco, its parent company Unilever United States, Inc., and its affiliates have operated under many different structures and names in its long history dating back to 1880. The information sought in Request No. 6 can be found in public records, SEC filings and New York Secretary of State records, which are already available to USEPA. Conopco has no further information responsive to this request that is not already available in the public records.

7. Provide a copy of the articles of incorporation, partnership agreement, article of organization or any other documentation (together with any amendments) demonstrating the particular business structure under which the Company has existed or operated since its inception

The information sought in Request No. 7 can be found in public records, SEC filings and New York Secretary of State records, which are already available to USEPA. Conopco has no further information responsive to this request that is not already available in the public records.

8. If the Company is operating or has operated under a fictitious business name, identify the fictitious name and the owner(s) of the fictitious name, and provide a copy of the Fictitious Business Name Statement filed with the Country in which the Company is or was doing business.

Conopco objects to the broad scope and nature of Request 8, in that the information sought has no bearing on the Site under investigation or the release of hazardous substances at the Site.

However, without waiving any specific objections, rights or privileges, and in the spirit of cooperation, Company does business as Unilever and Unilever Foodsolutions. In the past, Conopco, Inc. has done business as Chesebrough-Pond's USA, Good Humor-Breyers Ice Cream, Lever Brothers Company, Thomas J. Lipton Company, Unilever Bestfoods, Unilever Home and Personal Care, Unilever HPC, Unilever Ice Cream, Unilever North America, and other names.

9. Identify and explain any and all of the sales of the Company's assets if the sale represented a sale of substantially all of the Company's assets

Conopco objects to the broad scope and nature of Request 9 in that the information sought has no bearing on the Site under investigation or the deposition of hazardous substances at the Site. Conopco has sold assets, but the company still remains the main operating company for Unilever in the United States. Unilever PLC and Unilever NV, the ultimate parent companies, are publicly traded companies. No individual sales have resulted in a sale of most of Conopco's assets.

10. Identify and explain any investments by the Company in other businesses, companies or corporations equating to 5% or more of that other business, company, or corporation from the formation of the Company to the present

Conopco objects to the broad scope and nature of Request 10 in that the information sought has no bearing on the Site under investigation or the release of hazardous substances at the Site.

The information sought in Request No. 10 can be found in public records, SEC filings and New York Secretary of State records, which are already available to USEPA. Conopco has no further information responsive to this request that is not already available in the public records.

11. Identify the dates the Company, under any of its current or former business structures, owned the Facility or any portion of the Facility. Provide a copy of the title documentation, purchase agreements and any other documents evidencing the Company's ownership of the Facility or any portion of the Facility. As part of your response, identify the dates of ownership.

The title information sought in Request No. 11 can be found in public records that are already available to USEPA. Finding and producing purchase agreements and other documents evidencing Conopco's ownership of the Facility is unduly burdensome.

Without waiving any objections, Conopco provides this summary of property ownership. Records indicate that Chromal owned and operated a commercial plating business at the Facility located at 528 N. San Fernando Road from approximately 1940 to 1959. The northern portion of the Facility site was transferred to the State of California (Caltrans) in 1959, likely for the purpose of providing overhead rights for the Interstate 5 Freeway. Chromal transferred the southern portion of the site to the L&S Restaurant in 1959, this parcel was eventually transferred to Salvador and Consuelo Gonzalez, who sold it to Lawry's in 1981. The Facility property was used by Lawry's as a parking lot for its California Center. There were no buildings or structures on the Facility site.

Conopco believes that that real property referenced as Parcel 21 in the Quit Claim Deed is the portion of the Facility owned directly by Conopco, which was sold and transferred to Agoura Hills Marketplace LLC in 1998. See Exhibits A through D.

12. For any period of time for which the Company, under any of its current or former business structures, owned the Facility, provide the name, address, and phone number of any tenant or lessee. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to any other operators at the Facility.

Based upon its document review, Conopco did not lease the southern portion of the Facility property that it owned outright. Conopco also did not sublease the property that it leased from Caltrans.

13. During the Company's ownership of the Facility (under any of its current or former business structures), did the Company own the Facility jointly with any other individuals or entities? If so, provide the name, address and telephone number of each such joint owner and provide the periods of such joint ownership. In addition, provide all documents evidencing such joint ownership of the Facility.

No.

14. Did the Company, under any of its current or former business structures, operate a business at the Facility? If so, identify the dates during which the Company operated at the Facility.

The Facility property served as a parking lot for the Lawry's California Center. Although no early rental agreements were located, it is likely that parking lot operations began sometime after 1960. The California Center closed in 1991 and the real property, including the Facility property, were subject to environmental reviews in anticipation of sale. See Exhibits K through M. Conopco continued to rent the northern portion of the Facility from Caltrans throughout the Chromal Site Remediation, and the rental monies were used to fund the remediation. See Exhibit NN. Conopco sold its portion of the property to Agoura Hills Marketplace, LLC in 1998. See Exhibit D.

15. If the Company is the current owner of the Facility, did it acquire the Facility or any portion of the Facility during or after the disposal or placement of hazardous substances on, or at the Facility? Describe all of the facts on which you base the answer to this question.

Conopco is not the current owner of the Facility.

16. At the time you acquired the Facility, had you known or had reason to know that any hazardous substance had been disposed of on or at the Facility?

Based upon Conopco's document review, records do not indicate knowledge of any hazardous substance contamination at the time the Facility was acquired. The record appears to indicate that these issues first came to light when the business conducted an environmental assessment in anticipation of selling the California Center in 1991.

17. Provides copies of all investigations of the Facility you undertook prior to acquiring the Facility.

No such investigations have been identified at this time.

18. Identify all prior owners of the Facility. For each prior owner, further identify:

- a) The dates of ownership
- b) All evidence showing that they controlled access to the Facility; and
- c) All evidence that a hazardous substance, pollutant or contaminant, was released or threatened to be released at the Facility during the period that they owned the Facility.

Company objects to the broad scope and nature of Request 18. Dates of ownership for prior owners are available through public records. In the spirit of cooperation, Company provides the following information:

Records indicate that Chromal owned and operated a commercial plating business at the Facility located at 528 N. San Fernando Road from approximately 1940 to 1959. The northern portion of the Facility site was transferred to the State of California (Caltrans) in 1959, likely for the purpose of providing overhead rights for the Interstate 5 Freeway. Chromal transferred the southern portion of the site to the L&S Restaurant in 1959, this parcel was eventually transferred to Salvador and Consuelo Gonzalez, who sold it to Lawry's in 1981.

Conopco believes that the real property referenced as Parcel 21 in the Quit Claim Deed is the portion of the Facility owned directly by Conopco, which was sold and transferred to Agoura Hills Marketplace LLC in 1998. See Exhibits A through D.

Conopco objects to EPA's question concerning "evidence that they controlled access to the Facility," as overbroad, vague, and confusing. The Facility property was used by Lawry's as a parking lot for its California Center. There were no buildings or structures on the Facility site.

Conopco has no evidence about how the parking lot access was managed. Nor would there be any reason for Conopco to know anything about “controlled access” for the prior owners.

There is no evidence of hazardous substances spills or releases during Conopco’s ownership and tenancy; records of the Chromal Site Remediation and related litigation have already been referenced.

19. Identify all persons or entities that have operated the Facility during the Company’s period of ownership, including lessors, of the Facility. For each such operator, further identify:

- a) The dates of operation
- b) The nature of operations at the Facility;
- c) All evidence that they controlled access to the Facility; and
- d) All evidence that a hazardous substance, pollutant or contaminant was released or threatened to be released at or from the Facility and/or its solid waste units during the period that they were operating the Facility.

The northern portion of the Facility site was transferred to the State of California (Caltrans) in 1959. Lawry’s and Conopco obtained the southern portion of the site in 1981. Conopco’s understanding is that Lawry’s/Conopco leased the northern portion of the Facility from Caltrans. The Facility was used by Lawry’s as a parking lot for its California Center. Conopco objects to EPA’s question concerning “evidence that they controlled access to the Facility,” as overbroad, vague, and confusing. Again, the property was used as a parking lot, but no specifics of parking lot management are available. There is no evidence of hazardous substance releases at the Facility property during Conopco’s ownership and tenancy from approximately 1959-1998.

20. Identify all federal, state and local authorities that regulated the Facility owner and/or that interacted with the Facility owner with respect to environmental and health and safety issues.

Conopco objects to this request as overbroad and vague. Without waiving its rights, records indicated that Caltrans managed the lease for the northern portion of the Facility property, which functioned as a parking lot. RWQCB oversaw and approved the Chromal Site Remediation after Conopco ceased Facility operations.

21. Provide a list of all local, state and federal environmental permits granted for the Facility or part thereof (e.g., RCRA permits, NPDES permits, etc.).

The Facility property functioned as a parking lot and was not subject to environmental permitting.

22. Did the Facility ever file a Hazardous Waste Activity Notification under the Resource Conservation and Recovery Act (“RCRA”)? If yes, provide a copy of such notification.

The Facility never filed a Notification of Hazardous Waste Activity for the parking lot. The RCRA Generator ID for the Lawry's California Center was CAC 000167661. There was no copy of the notification available.

23. Did the Facility ever have "interim status" under RCRA? If yes, and the Facility does not currently have "interim status", describe the circumstances under which the Facility lost "interim status".

No.

24. Identify and provide all documents related to all violations, citations, and deficiencies issued by any federal, state, or local authorities concerning environmental and health and safety issues at the Facility.

California Regional Water Quality Control Board, Los Angeles Region issued Cleanup and Abatement Order No. 99-037 dated May 28, 1999 to Lawry's Foods, Inc. and Caltrans to clean up the Chromal Site; a copy of the Abatement Order is included as Exhibit G. The Abatement Order was issued subsequent to the parties establishing the Qualified Settlement Fund to fund and manage the Facility cleanup.

25. Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and the product(s) manufactured or services performed by the Company at the Facility. Describe any significant change in Facility size, the number of employees, or the products manufactured over time.

As noted previously, the Facility was a parking lot and this question is inapplicable.

26. Provide all maps and drawings of the Facility, including a scaled map showing the following:

- a) Property boundaries, including a written legal description
- b) Underground utilities (telephone, electrical, sewer, water main, etc.);
- c) Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.);
- d) Maintenance shops, machine shops, degreasers, liquid waste tanks, chemical storage tanks and fuel tanks;
- e) Surface structures (e.g. building, tanks, etc.);
- f) Groundwater and dry wells;
- g) Storm water drainage system, and sanitary sewer systems, past and present, including septic tank(s), subsurface disposal field(s), and other underground structures; and
- h) Waste storage or waste accumulation areas as well as waste disposal areas, including but not limited to dumps, leach fields, burn pits, waste piles, landfills, surface
- i) impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.

As noted, the Facility property functioned as a parking lot during Conopco's ownership and tenancy, and records do not that indicate that there were structures, wells or utilities, as outlined in this question.

As noted previously, Exhibits A through D include the available deeds that have written legal descriptions of the property. Based on document review, Conopco believes that the real property referenced in the Quit Claim Deed (Exhibit C) as Parcel 21 is the portion of the Facility owned directly by Conopco.

The Company has enclosed many remediation reports that include some information that is partially responsive to these queries, specifically with regard to groundwater wells, since monitoring wells were installed as part of the remediation. Levine-Frick's Soil Remediation Report, includes one of the better maps of the Facility property in Figure 2 of Exhibit S.

27. For 26 (a) through (b), provide the following information:

- a) The type of utility, structure, well, drainage/sewer system, or waste storage/accumulation area:**
- b) Whether the utility, structure, well, drainage/sewer system, or waste storage/accumulation area is currently in operations;**
- c) The dates that the utility, structure, well, drainage/sewer system, or waste storage/accumulation area was in use;**
- d) The purpose and past usage of the utility, structure, well, drainage/sewer system or waste storage/accumulation area (e.g., storage, spill, containment, etc.);**
- e) The quantity and types of materials (hazardous substances and any other chemicals) handled, used, stored disposed of in or at each utility, structure, well, drainage/sewer system, or waste storage/accumulation area;**
- f) For groundwater and dry wells identified pursuant to request 26(f), provide drilling logs, date(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s).**
- g) For storm water drainage and sanitary sewer systems identified pursuant to request 26(g), explain when and how such systems are or were emptied; and**
- h) Describe any and all additions, demolitions, or changes of any kind on, under or about the Facility, its physical structures or to the property itself (e.g. excavation work); and any planned additions, demolitions or other changes to the Facility.**

As noted, the Facility property functioned as a parking lot during Company's ownership and tenancy, and records do that indicate that there were structures or utilities, as outlined in this question. Remediation reports do include information about groundwater monitoring well installations.

28. Provide copies of all environmental data or technical or analytical information regarding soil, water, and air conditions at or adjacent to the Facility, including but not limited to, environmental data or technical or analytical information related to soil

contamination, soil sampling, soil gas sampling, geology, water (ground and surface), hydrogeology groundwater sampling, and air quality.

Reports and data responsive to this inquiry are provided as Exhibits F through FF.

29. Identify all leaks, spills or releases into the environment of any hazardous substances, pollutants, or contaminants containing TCE, PCE, 1,4-dioxane, chromium or hexavalent chromium that have occurred at or from the Facility. In addition, identify:

- a) When such releases occurred;
- b) How the releases occurred (e.g., when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated);
- c) The amount of each hazardous substances, pollutants, or contaminants so released;
- d) Where such releases occurred;
- e) Any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
- f) Any and all investigations of the circumstances, nature, extent or locations of each release or threatened release including, the result of any soil, water (ground and surface), or air testing undertaken; and
- g) All persons with information relating to these releases.

Based upon the documents reviewed, no such releases of any hazardous substances, pollutants, or contaminants containing TCE, PCE, 1,4-dioxane, chromium or hexavalent chromium occurred during Conopco / Lawry's ownership and tenancy at the Facility property. As noted previously, the environmental reports indicate that there was hazardous substance contamination, including chromium contamination, prior to Lawry's purchase/rental of the Facility property in question. As indicated in prior responses, Conopco is providing documents associated with the investigation and remediation of the Chromal Site at Exhibits F through FF.

30. Was there ever a spill, leak, release or discharge of hazardous substances containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium into any subsurface disposal system or floor drain inside or under any building located at the Facility? If the answer to this question is anything but an unqualified "no", identify:

- a) Where the disposal system or floor drains were located;
- b) When the disposal system or floor drains were installed;
- c) Whether the disposal system or floor drains were connected to pipes;
- d) Where such pipes were located and emptied;
- e) When such pipes were installed;
- f) How and when such pipes were replaced, or repaired; and
- g) Whether such pipes ever leaked or in any way released hazardous substances into the environment.

No (during Conopco/Lawry's ownership and tenancy).

31. Has any contaminated soil ever been excavated or removed from the Facility? Unless the answer to this question is anything besides an unequivocal "no", identify:

- a) Amount of soil excavated;
- b) Location of excavation;
- c) Manner and place of disposal and/or storage of excavated soil;
- d) Dates of soil excavation;
- e) Identity of persons who excavated or removed the soil;
- f) Reason for soil excavation;
- g) Whether the excavation or removed soil contained hazardous substances and why the soil contained such substances;
- h) All analyses or tests and results of analyses of the soil that was removed from the Facility; and
- i) All persons, including contractors, with information about (a) through (h) of this request.

Information partially responsive to these more specific queries are included in the Levine Fricke Remediation Reports, included as Exhibits F through FF. For the most part, soil was excavated and treated on-site and this work was overseen and approved by the RWQCB. The comprehensive Soil Remediation Report includes the most relevant and responsive information for this request. See Exhibits S, T, and U.

32. Describe the acts or omissions of any persons other than your employees, agents or those persons with whom you had a contractual relationship, that may have caused the release or threat of release of hazardous substances at the Facility and damages relating therefrom and identify such persons.

Based on documents reviewed, Conopco has no information responsive to this request. As noted, Conopco operated a parking lot at the Facility property and any contamination at the property was associated with the prior owner, Chromal.

33. Provide copies of hazardous material business plans and chemical inventory forms (original and updates) submitted to city, county, and state agencies.

Conopco did locate a California Business Plan dated 1989 for the entire California Center, which is included as Exhibit E. The plan did not indicate that hazardous substances were stored or managed at the Facility (parking lot) property.

34. Provide a list of all chemicals and hazardous substances containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium used at the Facility, identifying the chemical composition and quantities used. Provide copies of Material Safety Data Sheets (or "Safety Data Sheets") for all hazardous substances used.

To Conopco's knowledge, no chemicals or hazardous substances containing TCE, PCE, 1, 4-dioxane, chromium or hexavalent chromium were used at the Facility or the California Center or during the operation of the parking lot at the Facility property.

35. Identify and provide the information below for all volatile organic compounds (most notably PCE and TCE); total and hexavalent chromium; and 1,4-dioxane that are or were used at, or transported to, the Facility;

- a) **The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance and the Material Safety Data Sheet for each product;**
- b) **The location(s) where each chemical or hazardous substance is or was used, stored and disposed of;**
- c) **The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical waste, or hazardous substance;**
- d) **The quantity purchased (in gallons), the time period during which it was used, and the identity of all persons who used it; and**
- e) **The supplier(s), provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks, or any other documents pertaining to the supply of chemicals or hazardous substances.**

Conopco has no information responsive to this request. Conopco used no hazardous substances on-site during its ownership/tenancy at the Facility property based on available records.

36. If any substance containing chromium as a component ("chromium-related substances") was utilized in any of the Company's operations at the Facility, provide a complete description of those operations. Indicate the approximate volume of chromium or chromium-related substances used per month at the Facility, the dates chromium or chromium-related substances were used, and the storage and disposal practices in effect during the Company's operations at the Facility for materials containing chromium. Include documentation evidencing the Company's use of chromium or chromium-related substances.

Not applicable. Conopco used no hazardous substances on-site during its ownership/tenancy at the Facility property.

37. Identify and provide the following information for, all groundwater wells that are located at the Facility;

- a) **Date the Facility groundwater wells were last sampled;**
- b) **List of all constituents which were analyzed during groundwater sampling events; and**
- c) **All groundwater sampling results, reports of findings, and analytical data.**

Conopco has provided all available environmental reports concerning groundwater monitoring and remediation in Exhibits K through FF.

38. Identify all insurance policies held by the Company from the time it commenced ownership of the Facility until the present. Provide the name and address of each insurer, the policy number, the amount of the coverage and policy limits, the type of policy, and the expiration date of each policy. Include all comprehensive general liability policies and “first party” property insurance policies and all environmental impairment insurance. Provide a complete copy of each policy.

Conopco and Caltrans pursued cost recovery against the Chromal Plating Company, its successors in interest, and its insurers. The Settlements from the cost recovery case are enclosed and contain some relevant insurance information at Exhibits GG through NN.

39. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Facility concerning insurance issues.

Based upon its document review, Conopco has not identified any such responsive documents or information at this time.

40. Provides copies of any applications for permits or permits received under any local, state, or federal environmental laws and regulations, including any waste discharge permits, such as national pollutant discharge elimination system permits.

Conopco did not identify any environmental permits or applications to operate the parking lot at the Facility property.

41. If the Company discharged any of its waste stream to the sewer at the Facility, provide copies of all permits and all analyses performed on discharge water, and identify all locations where waste streams were discharged.

Conopco did not identify any environmental permits or analyses associated with the discharge of water at the parking lot at the Facility property.

42. For each waste stream generated at the Facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.

Based upon its document review, Conopco has not identified any specific waste streams associated with the parking lot located at the Facility property.

43. Please provide a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the Facility prior to transport to a disposal site.

Based upon its document review, Conopco has not identified any specific waste or wastewater streams or pre-treatment procedures associated with the parking lot located at the Facility property.

44. Please describe the method used by the Company to remove waste streams from sumps at the Facility.

Based upon its document review, Conopco has not identified any sumps associated with the parking lot located at the Facility property or associated procedures.

45. Please identify all wastes that were stored at the Facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.

Based upon its document review, Conopco has not identified any wastes that were stored at the parking lot located at the Facility property.

46. Please identify all leaks, spills, or other releases into the environment of any hazardous substance, or pollutants or contaminants containing TCE, PCE, 1,4-dioxane, chromium or hexavalent chromium that have occurred at or from the Facility. In addition, identify and provide supporting documentation of:

- a) The date each release occurred;
- b) The cause of each release
- c) The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
- d) Where each released occurred and what areas were impacted by the release; and
- e) Any and all activities undertaken in response to each release, including the notification of any local, state or federal government agencies about the release.

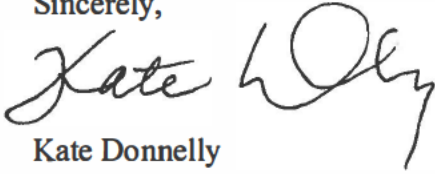
See response to Question 29.

47. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances containing TCE, PCE, 1,4-dioxane, chromium or hexavalent chromium at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.

Conopco is providing correspondence with RWQCB at Exhibits F through J relating to the Chromal Property Remediation activities.

If you have any question about Conopco's response or the enclosed documents, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kate Donnelly". The signature is fluid and cursive, with the first name "Kate" written in a larger, more prominent script than the last name "Donnelly".

Kate Donnelly
Senior Counsel – Environmental & Safety

Enclosures

Exhibit Index
Exhibits included on Flash Drive

Flash drive Password: Welcome1

LAWRY'S 528 N. SAN FERNANDO ROAD 104E RESPONSE

EXHIBIT DOCUMENT INDEX

Real Property

- A. January 19, 1959 (Chromal to State of California Deed); July 27, 1959 (Chromal to L&S Restaurant Deed); January 2, 1981 (Gonzalez to Lawry's Foods Deed) - Deeds
- B. June 1, 1989 – Freeway Lease No. 7-LA-5-13 between the City of Los Angeles and Lawry's Food, Inc.
- C. November 18, 1996 Quitclaim Deed to Conopco Property Description
- D. November 16, 1998 Grant Deed to Agoura Hills Marketplace LLC

Regulatory & Remediation Correspondence

- E. March 1989 California Business Plan Chemical Inventory
- F. March 6, 1997 – Lawry's California Center, 570 West Avenue 26, Los Angeles Site Assessment and Cleanup Activities (File No. 95-093 & 95-094)
- G. May 28, 1999 – Cleanup and Abatement Order No. 99-037, Conopco and Caltrans Former Chromal Plating Facility, Lawry's California Center, 528 San Fernando Road, Los Angeles (File No. 95-094)
- H. June 4, 1999 Lawry's California Center, Former Chromal Plating Facility, 528 San Fernando Road, Los Angeles Soil Remediation Activities, Cleanup and Abatement Order No. 99-037 (File No. 95-094; SLIC #456)
- I. August 10, 2000 Soil Remediation Closure Lawry's California Center, Former Chromal Plating Facility, 528 San Fernando Road, Los Angeles (File No. 95-094)
- J. June 19, 2003 – Site Closure (Groundwater) Lawry's California Center, Former Chromal Plating Facility, 528 San Fernando Road, Los Angeles (CAO No. 99-037; File No. 95-094)

Remediation Submittals

- K. August 9, 1991 - Phase I Subsurface Investigation Report Lawry's California Center Los Angeles, California LF 2377
- L. June 4, 1992 Summary of Phase I, II and III Soil and Ground Water Investigations through December 1991 Lawry's California Center Los Angeles, California LF 2377-04
- M. January 25, 1993 - Summary of Subsurface Investigation Activities through December 1992 Lawry's California Center Los Angeles, California LF 2377-04
- N. February 12, 1997 Fourth Quarter 1996 Status Report Lawry's California Center, 570 West Avenue 26, Los Angeles, California LARWQCB File Nos. 95-093 and 95-094

- O. July 30, 1997 Second Quarter 1997 Status Report Lawry's California Center – File Nos. 95-093 and 95-094 - 3077/3519
- P. October 27, 1997 - Third Quarter 1997 Status Report Lawry's California Center File Nos. 95-093 and 95-094 3077.00/6257.00
- Q. January 15, 1997/1998 (should be 01/15/1998. Typo on the cover page) Fourth Quarter 1997 Status Report Lawry's California Center File Nos. 95-093 and 95-094 - 3077.00/6257.00
- R. April 1, 1998 - First Quarter 1998 Status Report Lawry's California Center – File Nos. 95-093 and 95-094 3077.00/6257.00
- S. November 23, 1999 - Soil Remediation Report Former Chromal Plating Company Site Former Lawry's California Center Los Angeles, California Case File No. 95-094; CAO No. 99-037 Volume I
- T. November 23, 1999 - Soil Remediation Report Former Chromal Plating Company Site Former Lawry's California Center Los Angeles, California Case File No. 95-094; CAO No. 99-037 Volume II
- U. November 23, 1999 - Soil Remediation Report Former Chromal Plating Company Site Former Lawry's California Center Los Angeles, California Case File No. 95-094; CAO No. 99-037 Volume III
- V. December 1, 1999 Groundwater Monitoring (Fourth Quarter 1999) Former Chromal Plating Company Site – Former Lawry's California Center Case File No. 95-094/CAO No. 99-037
- W. March 10, 2000 Groundwater Monitoring (First Quarter 2000) Former Chromal Plating Company Site – Former Lawry's California Center Case File No. 95-094/CAO No. 99-037
- X. July 7, 2000 Groundwater Monitoring (Second Quarter 2000) Former Chromal Plating Company Site – Former Lawry's California Center Case File No. 95-094/CAO No. 99-037
- Y. September 22, 2000 Groundwater Monitoring (Third Quarter 2000) and Evaluation of Groundwater Conditions Report Former Chromal Plating Company Site Former Lawry's California Center Case File No. 95-094/CAO No. 99-037
- Z. January 17, 2001 - Groundwater Monitoring (Fourth Quarter 2000) and Evaluation of Groundwater Conditions Report Former Chromal Plating Company Site Former Lawry's California Center Case File No. 95-094/CAO No. 99-037
- AA. April 12, 2001 Groundwater Monitoring Report First Quarter 2001 Former Chromal Plating Company Site – Former Lawry's California Center Case File No. 95-094/CAO No. 99-037
- BB. July 9, 2001 - Groundwater Monitoring Report – Second Quarter 2001 Former Chromal Plating Company Site – Former Lawry's California Center Case File No. 95-094/CAO No. 99-037
- CC. October 8, 2001 Groundwater Monitoring Report Third Quarter 2001 Former Chromal Plating Company Site Former Lawry's California Center Case File No. 95-094/CAO No. 99-037

- DD. December 14, 2001 Groundwater Monitoring Report Fourth Quarter 2001 – Former Chromal Plating Company Site Former Lawry's California Center Case File No. 95-094/CAO No. 99-037
- EE. May 20, 2002 – Groundwater Monitoring Report First Half 2002 Former Chromal Plating Company Site Former Lawry's California Center – Case File No. 95-094/CAO No. 99-037
- FF. December 2, 2002 – Groundwater Monitoring Report Second Half 2002 – Former Chromal Plating Company Site for Former Lawry's California Center Case File No. 95-094/ CAO No. 99-037

Litigation

- GG. January 22, 1996 Freeman, Freeman & Smiley Letter
- HH. September 20, 1996 - Settlement Agreement and Mutual Release
- II. Settlement Agreement between Travelers and Conopco
- JJ. Settlement Agreement between National Union and Conopco
- KK. Settlement Agreement between Liberty Mutual and Conopco
- LL. May 1, 1997 - Confirmed Stipulation Requesting Court to find Settlement to be in good faith to approve settlement, and to dismiss action; order thereon
- MM. Consultant Services Agreement
- NN. Joint Remediation Agreement

BitLocker Drive Encryption Recovery Key

The recovery key is used to recover the data on a BitLocker protected drive.

To verify that this is the correct recovery key compare the identification with what is presented on the recovery screen.

Recovery key identification: 95A7B1A3-7894-40

Full recovery key identification: 95A7B1A3-7894-401D-B9FB-A699DC6A47FC

BitLocker Recovery Key:

145530-129459-333003-118800-565081-190883-530024-665005

Welcome!